

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS STEPHEN B.
HAGENSTEIN TO AMERICAN POSTAL WORKERS UNION, AFL-CIO
INTERROGATORY APWU/USPS-T3-1**

The United States Postal Service hereby provides the response of Witness Stephen B. Hagenstein to the above-listed interrogatory. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 26, 2021

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HAGENSTEIN
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO**

APWU/USPS-T3-1. In your testimony at page 24, you note that the service standard changes will affect urban and rural mail nearly equally.

- a. Identify each rural area by state and town/village/locality that falls within the following categories identified in the Request for Advisory Opinion:
 - i. Rural areas in intra-SCF and inter-SCF First-Class Mail within the 48 contiguous states where the combined drive time between origin P&DCF, destination ADC, and destination SCF is more than three hours, but does not exceed 20 hours (changing to a three-day service standard).
 - ii. Rural areas in inter-SCF First-Class Mail within the 48 contiguous states where the combined drive time between origin P&DCF, destination ADC, and destination SCF is more than 20 hours but does not exceed 41 hours (changing to a four-day service standard).
 - iii. Rural areas in the contiguous 48 states where the drive time between origin P&DCF, destination ADC, and destination SCF exceeds 41 hours (changing to a five-day service standard).
- b. With regard to your answer to (a), above, identify the total number of “rural areas”, the total number of urban areas, and the percentage of “rural areas” as compared to the total of all areas, urban and rural, that will see a service standard change under the Postal Service’s proposal.

RESPONSE:

- a. Please see file “Urban_Rural_5digit_Detail_v4.xlsx” in USPS-LR-N2021-1-24.
- b. Please see file “Urban_vs_Rural_5DPair_Impacts_26May21_V3.xlsx” in USPS-LR-N2021-1-24.